Commonwealth of Kentucky Division for Air Quality

PERMIT APPLICATION SUMMARY FORM

Completed by: IL-Won Shin

GENERAL INFORMATION:		
Name:	Green Tokai Company, LTD	
Address:	1725 Downing Drive	
	Maysville, KY 41056	
Date application received:	April 12, 2007	
SIC/Source description:	3089, Plastics Products, NEC	
Source ID #:	21-161-00035	
Source A.I. #:	39209	
Activity #:	APE20070001	
Permit number:	F-06-065 R1	
APPLICATION TYPE/PERMIT ACTIVITY:		
[] Initial issuance	[] General permit	
[x] Permit modification	[x] Conditional major	
Administrative	Title V	
x Minor	Synthetic minor	
Significant	[x] Operating	
[] Permit renewal	[] Construction/operating	
COMPLIANCE SUMMARY:		
[] Source is out of compliance	[] Compliance schedule included	
[x] Compliance certification signed		
Applicable Decline Menter Light		
APPLICABLE REQUIREMENTS LIST:	CDC [v] CID	
	SPS [x] SIP ESHAPS [] Other	
[] Netted out of PSD/NSK []	Not major modification per 401 KAR 51:001, 1(116)(b)	
MISCELLANEOUS:		
[] Acid rain source		
[] Source subject to 112(r)		
[] Source applied for federally enf	orceable emissions cap	
[] Source provided terms for altern	native operating scenarios	
[] Source subject to a MACT stand	dard	
[] Source requested case-by-case 1	12(g) or (j) determination	
[] Application proposes new contr	ol technology	
[x] Certified by responsible official		
[x] Diagrams or drawings included		
[] Confidential business information	on (CBI) submitted in application	
[] Pollution Prevention Measures		
[] Area is non-attainment (list poll	utants):	

EMISSIONS SUMMARY:

Emissions Potential with the Limitation of Single HAP Emissions (F-06-065 R1)

Pollutant	2006 Actual (tpy)	Potential (tpy)
VOC	59.76	< 90
PM/PM ₁₀	0.186	0
Toluene	28.54	< 9
Xylene	0	< 9
Cumene	0	< 9
n-Hexane	0	< 9
Methyl Methacrylate	0.044	< 9
Methanol	1.23	0
Methyl Ethyl Ketone	11.14	0
Methyl Isobutyl Ketone	3.74	0
Source wide HAPs	44.694	< 22.5

SOURCE DESCRIPTION:

Green Tokai Company (GTC) manufactures a variety of plastic and rubber automotive products for use in interior and exterior sealing and trim applications. These parts are produced primarily on one of six plastic extrusion lines operated at GTC's Mayville, Kentucky facility. For any of the six lines, the process begins by applying an adhesive coating to a continuously moving metallic strip or wire. Polyvinyl chloride (PVC) or thermoplastic olefin (TPO) resin is then extruded over top of the metal core. The extruded plastic strip is then coated with an adhesive and sent through and electrostatic booth where a granulated nylon flocking material is applied. The continuous strip is then cut to length and cured in an electric drying oven. The only exception to this sequence is that Line #5 does not utilize the flocking station.

MINOR PERMIT REVISION 1: LIMITATION OF SINGLE HAP EMISSIONS

GTC was moved from Title V to Conditional Major status with the issuance of Permit F-06-065 on January 11, 2007. The terms of that permit imposed the following plant-wide restrictions:

- 90 TPY VOC:
- 22.5 TPY combined hazardous air pollutant (HAP); and
- 9.9 TPY for each single HAP

The purpose of this revision is to request a minor modification to F-06-065 such that the single HAP

limit is lowered from 9.9 TPY to 9.0 TPY. Along with this lowered emission rate, GTC is requesting that the monitoring requirement be amended from daily to monthly tracking of single HAP emissions. Reducing the monitoring frequency in this manner will better enable GTC to meet the permit terms with the resources they have available. Further, GTC believes that this proposed monitoring approach is consistent with KDEP's policy for permit limits at or below 90% of the applicable threshold.

EMISSIONS AND OPERATING CAPS DESCRIPTIONS:

The total annual source-wide emissions of volatile organic compounds (VOC), combined hazardous air pollutants (HAP), and any single HAP shall not exceed the following limitations on a twelve month (12) rolling total: [401 KAR 52:030, Section 1]. The initial 12-month compliance demonstration period shall begin on the January 1, 2007.

- (1) VOC emissions shall not exceed 90 TPY.
- (2) Emissions of combined HAP shall not exceed 22.5 TPY.
- (3) Emissions of any single HAP shall not exceed 9.0 TPY.

The source has accepted VOC emission 90 TPY to preclude 401 KAR 50:012 and 59:225. This annual limitation shall not be exceeded during any consecutive twelve months period for the entire source. The addition of extrusion line #6 will not affect this cap, as all six lines will be able to operate under this limit.

OPERATIONAL FLEXIBILITY:

None